

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**CHARLES GREENWOOD,**

On Behalf of Himself and All Others Similarly  
Situating,

Plaintiff,

v.

**EXPRESS VPN INTERNATIONAL LTD.  
d/b/a EXPRESS TECHNOLOGIES  
LIMITED,**

Defendant.

Case No. 1:25-cv-08121

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT  
BY 14 DAYS**

Service waived: July 29, 2025

Current response date: Sept. 19, 2025

New response date: Oct. 3, 2025

IT IS HEREBY STIPULATED and AGREED between Plaintiff Charles Greenwood and Defendant Express Technologies, Ltd., that, pursuant to Federal Rule of Civil Procedure 6(b), Defendant's time to respond to Plaintiff's Complaint—as to which Defendant waived service on July 29, 2025—is extended from September 19, 2025, to **October 3, 2025**.

Good cause exists for the agreed extension because it will allow the time needed for counsel for the parties to investigate the factual circumstances underlying the Complaint. It is further stipulated and agreed that this stipulation does not constitute a waiver of any claim, right, or defense. This requested extension will not affect any of the other dates currently set in this matter.

The parties jointly and respectfully request the Court's approval of this stipulated extension.

Dated: September 16, 2025  
Casselberry, FL

By: /s/ Nicolas G. Keller  
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Dated: September 16, 2025  
New York, NY

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